

EXHIBIT 31

KILBURN TAMARA
5/13/2021

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)	
Plaintiffs,)	
vs.)	No. 20-cv-00983-TSZ
CITY OF SEATTLE,)	
Defendant.)	

ZOOM VIDEO DEPOSITION UPON ORAL EXAMINATION
OF
TAMARA KILBURN
SWAY AND CAKE 30(b)(6)

9:00 a.m.
May 7, 2021

*** Contains Confidential Testimony and Exhibits ***

REPORTED BY: Pat Lessard, CCR #2104

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1 Sway and Cake during CHOP?

2 MR. WEAVER: Objection. Answer if you can.

3 A. There were street closures with cement
4 barricades on 12th, 12th and Pike.

5 Q. (By Ms. Pratt) And what street did those
6 cement barriers block car traffic to?

7 A. It blocked 12th Avenue heading towards the
8 police precinct, that block.

9 Q. So 12th Avenue heading north, is that right?

10 A. Yeah. If that's north, yeah. Toward the --
11 the same block that the police station is on.

12 Q. But Pike, which goes east and west, was not
13 blocked, right?

14 A. Correct. It was open.

15 Q. And how long was 12th heading north in front
16 of Sway and Cake blocked?

17 MR. WEAVER: Objection. 12th is not in
18 front of Sway and Cake. I just want to make sure
19 we're oriented here correctly.

20 Q. (By Ms. Pratt) All right. Why don't we
21 open an exhibit. I think it's 10 but I'll let you
22 know in a sec.

23 All right. Let's open Exhibit 10. Let me
24 know when you have that open.

25 Okay. So looking at Exhibit 10, is it

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C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, the undersigned Washington Certified Court Reporter, hereby certify that the foregoing deposition upon oral examination of TAMARA KILBURN was taken stenographically by me on May 7, 2021, and transcribed under my direction;

That the witness was duly sworn by me pursuant to RCW 5.28.010 to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript to the best of my ability; that I am neither attorney for nor relative or employee of any of the parties to the action or any attorney or counsel employed by the parties hereto, nor am I financially interested in its outcome.

I further certify that in accordance with CR 30(e) the witness was given the opportunity to examine, read and sign the deposition within 30 days upon its completion and submission, unless waiver of signature was indicated in the record.

IN WITNESS WHEREOF, I have hereunto set my hand this 11th Day day of May, 2021,

Pat Lessard

Pat Lessard,
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